

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RHODELLA WRIGHT,

Plaintiff,

v.

JEWISH CHILD CARE ASSOCIATION
OF NEW YORK,

Defendant.

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Case No. 13-CV-4976 (NRB)

**DEFENDANT'S NOTICE OF
MOTION FOR SUMMARY
JUDGMENT**

PLEASE TAKE NOTICE that upon the pleadings and prior proceedings had herein, the annexed Declaration of Susan D. Friedfel, Esq. in Support of Defendant's Motion for Summary Judgment and exhibits attached thereto, the annexed Declaration of Richard Hucke and exhibit attached thereto, the annexed Declaration of Lawrence Johnson and exhibits attached thereto, the annexed Declaration of Ruben Luyando and exhibits attached thereto, the annexed Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1, and the accompanying Memorandum of Law in Support of Defendant's Motion for Summary Judgment, Defendant Jewish Child Care Association of New York shall move this Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, at such time as the Court may direct, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment to Defendant and dismissing Plaintiff's Complaint in its entirety with prejudice, together with such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's Endorsement dated August 8, 2014, answering papers, if any, must be served upon the undersigned on or before September 15, 2014.

Dated: August 15, 2014
New York, New York

PROSKAUER ROSE LLP

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